



July 25, 2006

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Fresh Products Branch
Fruit & Vegetable Programs
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Room 1661 South Building, Stop 0240
Washington, DC 20250-0240

Dear Ms. Emery:

Re: United States Standards for Grades of Tomatoes on the Vine
Docket # FV-06-309, Fed. Reg. 5/26/06, page 30367

The North American Perishable Agricultural Receivers (NAPAR) is a national trade association located in Washington, DC, representing independent produce wholesale receivers. NAPAR members are predominantly small businesses with combined annual sales in excess of \$4 billion. NAPAR formed an operating alliance with the Food Marketing Institute in 1999, enabling it to function independently while expanding the services to its members.

On behalf of our members, I appreciate the opportunity to submit comments to USDA and hope our perspective is helpful in determining any need for the establishment of a voluntary U.S. Grade Standard for Tomatoes on the Vine. NAPAR surveyed its members, soliciting their input on the probable impact these changes would have on their business operations. Those members responding expressed support for the proposed grade standards, but voiced several concerns about certain provisions they perceive to be inadequately addressed. Those provisions involve color and brittle, decayed and moldy stems/vines.

Color

The proposed standards only touch on the issue of "color" in the Definitions Section, # 51.2171 Mature. Our members feel the standards need to address the issue of "Color" as a Classification, similar to how the issue of color is handled in the U.S. Standards for Grades of Fresh Tomatoes, Color Classification, # 51.1860. It is our hope

that this would be done so as to provide sufficient guidance during potentially contentious inspection situations.

Stems/Vines

Section 51.2165 U.S. No. 1 of the proposed standards requires that, "The vines shall not be brittle and shall be free from decay; and free from damage by mold or other means." However, the terms "brittle" and "mold" are not defined anywhere else in the standards. Our members feel that brittle and, or moldy stems/vines severely detract from the appearance and marketability of tomatoes on the vine and should, therefore, be scored against all grades.

I hope these insights are helpful and please feel free to contact me directly if NAPAR can provide further assistance during this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick A. Davis".

Patrick A. Davis
President